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7 Former Chapter 7 Trustee

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **SANTA ANA DIVISION**

11 In re

12 THE TULVING COMPANY, INC., a
13 California corporation,

14 Debtor.

Case No. 8:14-bk-11492-ES

Chapter 7

**SECOND INTERIM AND FINAL
APPLICATION OF R. TODD NEILSON
FOR ALLOWANCE AND PAYMENT OF
FEES AND EXPENSES INCURRED AS
CHAPTER 7 TRUSTEE FOR THE
PERIOD MAY 22, 2014 THROUGH
MARCH 31, 2016**

Date: To be determined

Time: To be determined

Place: Courtroom 5A
411 West Fourth Street
Santa Ana, CA 92701

22 **TO THE HONORABLE ERITHE SMITH, UNITED STATES BANKRUPTCY**
23 **JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; AND OTHER PARTIES**
24 **IN INTEREST:**

25 R. Todd Neilson, the duly appointed former Chapter 7 Trustee and responsible party for
26 the above-captioned estate (the "Former Trustee" or "Applicant"), respectfully represents:
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I.

INTRODUCTION

Applicant respectfully applies under 11 U.S.C. §§ 326, 330, 331, 503(b), and 507(a)(2) and Local Bankruptcy Rule 2016-1(a) for final allowance and payment of compensation for services rendered, and reimbursement of expenses incurred, from May 22, 2014 through March 31, 2016 (the “Application”). On March 22, 2016, the Trustee filed a withdrawal of Trustee notice effective April 1, 2016. On April 1, Weneta M.A. Kosmala was appointed as Successor Trustee (“Successor Trustee”).

In the Former Trustee’s first interim application for allowance and payment of fees and expenses (the “First Interim Application”), which covered the period May 22, 2014 through January 31, 2015 (“First Interim Reporting Period”), the Former Trustee sought approval of fees in the amount of \$694.25, the maximum amount allowable pursuant to 11 U.S.C. § 326, based on the estate moneys that had been disbursed by the Former Trustee through January 31, 2015, leaving \$76,056.75 in unrequested fees that exceeded the statutory cap that existed at that time. On March 24, 2015, the Court entered an order granting approval of fees and the Applicant was paid \$694.25 of fees and reimbursement of expenses in the amount of \$2,107.89. Applicant seeks final approval of fees and reimbursement of expenses granted on an interim basis from the First Interim Reporting Period.

During the period covered by this Application, February 1, 2015 through March 31, 2016 (the “Second Interim and Final Reporting Period” or “Reporting Period”), the Former Trustee and his staff incurred fees in the amount of \$89,364.00 representing 150.8 hours of services to the estate. Pursuant to 11 U.S.C. § 326, the trustee’s compensation is limited based upon all moneys disbursed in the case by the trustee to parties in interest, excluding the Debtor. The Applicant also advanced expenses during the Second Interim Reporting Period related to his services in the amount of \$606.84, for which he seeks final allowance.

The Applicant has incurred \$166,115.00 in fees through March 31, 2016 and been paid \$694.25 in fees. As previously noted, the Applicant withdrew as trustee as of March 31, 2016

1 and Weneta Kosmala was appointed trustee on April 1, 2016. On or about the same time, the
2 Applicant withdrew as trustee on other bankruptcy matters where outstanding trustee fees were
3 owed. On those other matters, the United States Trustee Office has requested the Former Trustee
4 and Successor Trustee complete a fee sharing agreement. To date, no fee sharing agreement has
5 been executed.

6 **A. Exhibits to this Application**

7 The nature and extent of the Former Trustee's services during the Reporting Period are
8 described in subsequent paragraphs and in the following exhibits to this Application:

9 Exhibit "A" contains summary schedules relating to the Former Trustee's fees incurred
10 during the Reporting Period.

11 Exhibit "B" contains the detailed time entries of the Former Trustee and his staff for
12 services rendered during the Reporting Period.

13 Exhibit "C" contains a summary and detailed schedule of each cost incurred during the
14 Reporting Period.

15 Exhibit "D" includes the resumes that describe the education and qualifications of the
16 professionals and paraprofessionals for the Former Trustee whose time constitutes the basis for
17 this Application.

18 Exhibit "E" includes the invoices received and paid by the Former Trustee related to the
19 creation and updating of the bankruptcy estate website tulvingbankruptcy.com.

20 **II.**

21 **BACKGROUND FACTS AND STATUS OF CASES**

22 **A. Procedural Background**

23 The Tulving Company Inc. a California corporation, ("Tulving" or "Debtor")
24 commenced this case by the filing of a voluntary petition for relief under chapter 11 of the
25 Bankruptcy Code on March 10, 2014. In light of pending criminal investigation and other
26 ongoing litigation, on March 18, 2014, the United States Trustee filed a Stipulation Appointing
27 Chapter 11 Trustee [Docket No. 15] ("Stipulation"), which was signed by both the Debtor and its
28 attorney. The Stipulation was approved by the Bankruptcy Court on March 18, 2014 [Docket

No. 16] and an Order was entered by the Court on March 21, 2014 approving the U.S. Trustee's Application for the Appointment of a Chapter 11 Trustee, appointing R. Todd Neilson as Trustee of the Debtor's estate [Docket No. 22]. Thereafter upon notice and hearing, the case was converted to a chapter 7 and R. Todd Neilson continues to serve as the chapter 7 Trustee [Docket No. 108].

On July 15, 2014, the Court entered an order authorizing the Former Trustee's employment of Berkeley Research Group, LLC ("BRG") as his accountants and financial advisors *Nunc Pro Tunc* to May 22, 2014 [Docket No. 151]. BRG was previously approved by the court for employment in the Chapter 11 Tulving bankruptcy matter.

On July 15, 2014, the Court entered an order authorizing the Former Trustee's employment of Pachulski Stang Zeihl and Jones, LLP ("PSZJ") as his counsel *Nunc Pro Tunc* to May 22, 2014 [Docket No. 152]. PSZJ was previously approved by the court for employment in the Chapter 11 Tulving bankruptcy matter.

On March 22, 2016, the Former Trustee filed a withdrawal of Trustee notice effective April 1, 2016. On April 1, Weneta M.A. Kosmala was appointed as Successor Trustee.

B. Debtor's History

The Debtor is a California corporation. Tulving was in the business of selling and purchasing gold, silver, coins, bullion, and other precious metals through its internet website or by phone. Prior to the filing of the bankruptcy, customer complaints concerning delayed or undelivered orders were increasingly made to the Better Business Bureau against the Debtor and in early March, 2014, a class-action lawsuit was filed against the Debtor and its principal in the United States District Court, Northern District of California. The Debtor ceased operations on or about March 3, 2014. Shortly before the initiation of these proceedings, a raid was conducted at the business offices of the Debtor by the Secret Service and the Department of Justice. A significant amount of coins, bullion and other precious metals were seized along with the Debtor's computers and documents for an ongoing criminal investigation.

C. Status of the Trustee's Investigation, Causes of Action and Settlements

Since his appointment, the Former Trustee and his professionals have conducted an investigation of the affairs of the Debtor. The coins which were seized are still in the possession of the Department of Justice ("DOJ") and the Secret Service, and it is their stated intention to have those coins liquidated in the future to pay the creditor/victims. After seizure, the DOJ obtained an independent valuation from a professional appraiser which listed the value of the coins at approximately \$3 million. Subsequent to this DOJ valuation, a different expert engaged by Mr. Tulving's legal counsel offered a valuation of \$7.3 million, well in excess of the previously stated \$3 million valuation. The difference between the two valuations is due to the incorrect valuation of Presidential Error Coins which were included in the coins seized by the government.

The Former Trustee would caution against a wholesale reliance on the valuations as provided by various independent appraisers. The infusion of a significant amount of Presidential Error Coins into the coin market could severely mitigate the amount of return for the creditor/victims. In the opinion of the Former Trustee, the sales process, when undertaken, must be handled in a measured and gradual fashion to insure the highest possible return and it will take a considerable period of time to fully realize the value of the coins. The Former Trustee has spent a significant amount of time coordinating his recovery efforts with those of the DOJ. Those discussions are ongoing and the Trustee believes the DOJ and the Former Trustee share the same goal – to provide for a sale of the seized items in a manner which will provide the highest possible return to the creditor/victims.

The Former Trustee has also been informed by Mr. Tulving's (principal of the Debtor) legal counsel of a number of additional coins that were not seized by the government and may ultimately belong to this estate. Those coins are in the possession of a third party and the Former Trustee was investigating such claims. The value of those coins has been asserted by the Debtor to be approximately \$4,000,000. However, for the reasons enumerated above, the Former Trustee believed it premature to ascribe any such value to coins which may, or may not be, recoverable for the estate. The Former Trustee requested additional information and documents from the third party and are awaited their response.

1 Through the investigation into the financial affairs of the Debtors, the Former Trustee and
2 his professionals became aware of certain outstanding accounts receivable owed to the Debtor.
3 The Former Trustee sent demand letters for outstanding accounts receivable to approximately 17
4 individuals and/or companies totaling approximately \$1,100,000. After receiving responses
5 from the demand letters and additional investigations by the professionals of the underlying
6 records of the Debtor, the actual amount was reduced to one creditor in the amount of \$594,000.
7 In order to minimize legal costs, the Former Trustee and his professionals formalized a payment
8 plan over a period of five years and the Former Trustee has collected \$26,000 to date. The
9 company that owed the approximate \$594,000 has defaulted on the agreement and the Estate is
10 moving forward with the collection process outlined in the agreement.

11 During the administration of the Chapter 11 bankruptcy, the Former Trustee conducted a
12 court approved auction on or about May 13, 2014, of the remaining Tulving assets located at 750
13 West 17th Street, Suite A, Costa Mesa, CA. In total, the auction generated gross sale proceeds of
14 \$28,220.20, incurred expenses of \$4,715.05 for a net total to the Tulving estate of \$23,505.15.
15 Of the remaining assets sold the majority of funds resulted from the sale of a 2008 Ford E-450
16 van and a Clark forklift. The sale of an additional vehicle, a Ford E-350 van, was contemplated
17 but following an investigation of the current value as compared to the debt on the van, the van
18 was returned to Ford Motor Company.

19 The Former Trustee also was receiving numerous calls from companies regarding the
20 possible sale of certain assets of the Debtor. Specifically, the sale of the Tulving websites
21 domain name and electronic mail, 1-800 telephone number and customer contact and sale
22 information.

23 On January 12, 2015, the Former Trustee closed the court approved sale of substantially
24 all of Tulving's assets (domain name, 1-800 telephone number, customer contact information,
25 etc.) for a total amount of \$150,000.

26 The Former Trustee and his professionals also became aware of certain
27 individuals/companies that may hold unsecured claims in the estate. The Former Trustee
28 requested his accountants to determine the total amount of possible unsecured claims in the

1 estate and the total number of claimants. This information has been the used to verify the proofs
2 of claim ("POC's") filed with in this estate and been provided to the Federal Government upon
3 their request.

4 During the Second Interim and Final Reporting Period, the Former Trustee and his
5 professionals continued investigating A-Mark Precious Metals ("A-Mark") a company with
6 whom Tulving had an extensive financial relationship. In order to more fully understand the A-
7 Mark and Tulving relationship the debtor conducted a Rule 2004 exam of A-Mark. Following
8 consultations with the attorneys representing A-Mark the Former Trustee received a significant
9 amount of accounting records on December 30, 2014. After reviewing information and
10 documentation the applicant determined no such complaints would be filed against A-Mark.

11 The Former Trustee also brought two causes of action against Levon and Armen
12 Gugasian. As detailed in the complaint, the first is against Levon Gugasian and seeks the return
13 of approximately \$1.9 million in lease payments which the estate asserts were the result of a set
14 of convoluted transactions which resulted in the Tulving Co. paying rents which were
15 substantially above the market value for those leases. The complaint also seeks repayment of
16 consulting fees paid by Tulving to Mr. Gugasian which we allege were wrongfully transferred to
17 Mr. Gugasian and should therefore be returned to the estate.

18 The second complaint, which is against Armen Haig Gugasian, the son of Levon
19 Gugasian, and seeks the return of Consulting Fees which we assert provided no value to the
20 estate and conferred no benefit to the Debtor.

21 Please see PSZJ's application for interim compensation filed concurrently with this
22 Application for additional details on the Former Trustee and Successor Trustee's investigation,
23 causes of action and settlements.

24 **D. Estate Cash**

25 As of May 31, 2018, the estate was holding approximately \$1,274,187.22 in funds.

26 **III.**

27 **SUMMARY DESCRIPTION OF SERVICES**

28 Without limiting the detail of the Former Trustee's services contained in Exhibit "C",
following are summary descriptions of the services provided during the Reporting Period:

A. 110 – Funds Administration
(Hours: 10.0; Fees: \$1,510.50)

Time incurred for this category during the Reporting Period included the review of invoices, check and wire transfer processing, review and processing of deposits, maintenance of receipt and disbursement ledgers, bond maintenance, bank reconciliations, and maintenance of files.

B. 130 – Compliance Reporting
(Hours: 7.2; Fees: \$3,268.00)

During the Reporting Period, the Applicant incurred time reviewing, revising and signing interim and annual case status reports submitted to the Office of the U.S. Trustee. The Applicant also reviewed and signed semi-annual and annual bond reports submitted to the United States Trustee.

C. 200 – Claims Issues
(Hours: 1.5; Fees: \$1,062.00)

Most of the time incurred in this category during the Reporting Period was with respect to the review of POC's filed against the estate. There were originally approximately 485 creditors listed in Tulving books and records. The total amount of possible claims according to the records of the Debtor is \$18,707,906. The total amount of claims filed within the estate total \$18,032,113, which includes duplicative, amended, overstated and non-customer amounts. This amount represents a large percentage of possible Tulving claims. The Former Trustee and his professionals have completed almost all claims objections.

D. 220 – Creditor Meetings and Communications
(Hours: 7.2; Fees: \$5,102.00)

During the Reporting Period, Former Trustee time was spent responding to creditor inquiries and writing Trustee Reports, that have been uploaded to the Tulving bankruptcy website. Applicant has diligently attempted to notify and update the estate creditors on a regular basis of events and the process of the Tulving bankruptcy. The Former Trustee has written eight

(8) “Trustee Reports” ranging from four (4) to six (6) pages in length which were posted on the Tulving Bankruptcy website.

E. 320 – Sale of Customer Info. IP and Operational Assets

(Hours: 2.6; Fees: \$1,820.00)

This category includes Former Trustee time dealing with the sale of the Debtors’ assets. These services include research, analysis, discussions, emails and meetings concerning the sale process and due diligence information to be provided to interested buyers. Several discussions were held with potential interested buyers and the final purchaser. The Former Trustee also began coordinating and preparing for the closing of the court approved sale, which occurred on January 12, 2015. The Former Trustee and estate received the \$150,000 for the sale of the assets.

F. 350 – General Asset Disposition Issues

(Hours: 40.3; Fees: \$28,406.00)

During this Reporting Period, Former Trustee time was spent reviewing coin inventory’s and speaking with coin specialists regarding the potential value and/or distribution of coins to creditors. Also, the Applicant reviewed asset values and determined the insurance availability of those possible assets.

G. 351 – Asset – Accounts Receivable

(Hours: 4.2; Fees: \$2,683.00)

Most of the time incurred in this category during the Reporting Period was with respect to negotiating and settling an accounts receivable balance owed to Tulving in the approximate amount of \$594,000. A payment plan has been established and to date, the Former Trustee has received 26,000 on the outstanding balance.

H. 500 – Litigation Analysis and Issues

(Hours: 4.6; Fees: \$2,971.00)

During the Reporting Period, Former Trustee time was spent communicating with counsel and accountants regarding financial transactions involving A-Mark, Marc One, and the Gugasian’s.

I. 600 – Government Inquires and Coordination

(Hours: 44.1; Fees: \$30,865.00)

The time incurred in this category during the Reporting Period was communicating and coordinating with the DOJ and Secret Service. As stated previously, there was an on-going criminal investigation into the operations and transaction of Hannes Tulving Jr. the principal of the Debtor. The Former Trustee has communicated closely with the DOJ regarding the criminal investigation. The Former Trustee also worked with the DOJ regarding the approximate losses incurred by Tulving creditors. Applicant also communicated with the DOJ regarding the liquidation of the confiscated coins and bullion and the process of distributing those proceeds to the creditors of Tulving.

J. 900 – General Case Administration

(Hours: 2.9; Fees: \$821.50)

Time was spent by the Former Trustee and his staff on general case administration duties. Included in these services were the following: review of incoming correspondence and pleadings; general discussions regarding case issues; general case document filing; and other general office administrative functions.

925 – Meeting and Communication – H. Tulving / Counsel

(Hours: 1.3; Fees: \$910.00)

Former Trustee time incurred in this category includes meetings and communications with Hannes Tulving Jr. and his counsel. Subject to the approval of Mr. Tulving's criminal counsel, the Former Trustee and a financial advisor met with Mr. Tulving to discuss certain transactions, possible causes of action, the potential value of confiscated coins, additional assets and other areas of the Tulving Company.

K. 940 – Fee Application and Bill Preparation

(Hours: 24.9; Fees: \$9,945.00)

The Former Trustee incurred fees in the preparation of the First and Second Interim and Final fee applications, which covered the period May 22, 2014 to March 31, 2016.

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IV.

SUMMARY DESCRIPTION OF EXPENSES

The Former Trustee incurred out-of-pocket costs in connection with services rendered to the estate, summarized as follows:

A. Express Messenger/Shipping (\$94.79)

These consist of actual costs of overnight deliveries of documents and packages.

B. Postage (\$31.50)

This consists of actual postage charges for case related mailings

C. Travel –Other (\$56.50)

Applicant tracks mileage traveled to/from meetings and hearings that Applicant is required to attend. Applicant charges \$.56 per mile.

D. Web Designer (\$424.05)

Applicant contacted a web designer to create and update the Tulving bankruptcy website. The invoices from the web designer are attached as Exhibit F

V.

CONCLUSION

The Former Trustee believes compensation requested herein is warranted based on the quality of services rendered, the complexity of the issues at hand, the desirability of employment, the results obtained and the contingency thereof, as well as the actual hours expended. The Former Trustee believes full payment of his fees is justified when weighed against the benefit of the work, as described above.

No agreement exists between the Former Trustee and any other person for the sharing of such compensation received in connection with this case.

As previously noted, the Applicant withdrew as trustee as of March 31, 2016 and Weneta Kosmala was appointed trustee on April 1, 2016. On or about the same time, the Applicant withdrew as trustee on other bankruptcy matters where outstanding trustee fees were owed. On those other matters, the United States Trustee Office has requested the Former Trustee and

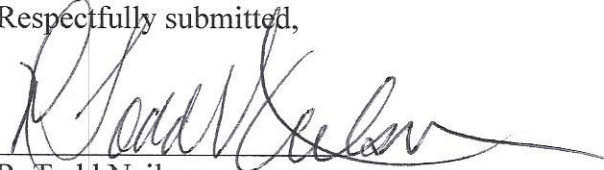
1 Successor Trustee complete a fee sharing agreement. To date, no fee sharing agreement has
2 been completed.

3 Notice of this fee application has been given to creditors and parties in interest.

4 WHEREFORE, Applicant respectfully requests (a) final allowance and approval for fees
5 incurred during the First Interim Reporting Period; (b) final allowance of reimbursement of
6 expenses incurred during the First Interim Reporting Period in the amount of \$2,107.89; (c) final
7 allowance and approval for fees incurred during this Reporting Period; (d) final allowance and
8 approval for reimbursement of expenses incurred during the Reporting Period in the amount of
9 \$606.84 and (e) for such other further relief as the court deems just and proper.

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12 Dated: June 1, 2018

13 Respectfully submitted,

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16 R. Todd Neilson
17 Former Chapter 7 Trustee
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Exhibit A

THE TULVING COMPANY, INC.
R. TODD NEILSON, CHAPTER 7 TRUSTEE
TASK CODE SUMMARY

February 1, 2015 through March 31, 2016

Task Code	Description	Hours	Amount
110	Funds Administration	10.00	1,510.50
130	Compliance Reporting	7.20	3,268.00
200	Claims Issues	1.50	1,062.00
220	Creditor Meetings and Communications	7.20	5,102.00
320	Sale of Customer Info., IP and Operational Assets	2.60	1,820.00
350	General Asset Disposition Issues	40.30	28,406.00
351	Asset - Accounts Receivable	4.20	2,683.00
500	Litigation Analysis and Issues	4.60	2,971.00
600	Government Inquires & Coordination	44.10	30,865.00
900	General Case Administration	2.90	821.50
925	Meeting and Communication - H. Tulving/Counsel	1.30	910.00
940	Fee Application and Bill Preparation	24.90	9,945.00
Total Professional Services		150.80	\$89,364.00

THE TULVING COMPANY, INC.
R. TODD NEILSON, CHAPTER 7 TRUSTEE
PROFESSIONAL SERVICES - TIMEKEEPER SUMMARY

February 1, 2015 through March 31, 2016

	Rate	Hours	Amount
<hr/>			
<u>Managing Director:</u>			
Todd Neilson (2016 Rate)	\$720.00	18.30	\$13,176.00
Todd Neilson (2015 Rate)	\$700.00	93.60	\$65,520.00
<u>Associate Director:</u>			
Nicholas Troszak (2015 Rate)	\$420.00	17.80	\$7,476.00
<u>Paraprofessional:</u>			
Rowen Dizon (2016 Rate)	\$155.00	5.40	\$837.00
Rowen Dizon (2015 Rate)	\$150.00	13.90	\$2,085.00
Evelyn Perry (2015 Rate)	\$150.00	1.80	\$270.00
Totals		<hr/> 150.80 <hr/>	<hr/> \$89,364.00 <hr/>

Exhibit B

THE TULVING COMPANY, INC.
R. TODD NEILSON, CHAPTER 7 TRUSTEE
DETAIL OF TASK CODES

February 1, 2015 through March 31, 2016

Date	Name	Description	Hours	Rate	Amount
Task Code: 110		Funds Administration			
02/17/15	Dizon, Rowen	Reviewed check requests and processed payments.	0.20	150.00	30.00
02/23/15	Dizon, Rowen	Reviewed check request and processed payment to Wesley Avery.	0.20	150.00	30.00
02/23/15	Dizon, Rowen	Processed funds transfer.	0.10	150.00	15.00
02/23/15	Dizon, Rowen	Reviewed and analyzed bank reconciliation and posted adjustments for Union account.	0.20	150.00	30.00
03/06/15	Dizon, Rowen	Confirmed wire from BMS.	0.10	150.00	15.00
03/17/15	Dizon, Rowen	Reviewed check requests and processed payments.	0.20	150.00	30.00
03/17/15	Dizon, Rowen	Provided wire information to case accountant.	0.10	150.00	15.00
03/23/15	Dizon, Rowen	Confirmed wire from BMS.	0.10	150.00	15.00
03/24/15	Dizon, Rowen	Reviewed check requests and processed payments.	0.20	150.00	30.00
03/25/15	Dizon, Rowen	Reviewed check requests and processed payments.	0.80	150.00	120.00
03/25/15	Dizon, Rowen	Reviewed emails from case accountant regarding checks descriptions.	0.10	150.00	15.00
03/26/15	Dizon, Rowen	Processed checks for Franchise Tax Board.	0.20	150.00	30.00
03/26/15	Dizon, Rowen	Processed bank wires to BMS.	0.20	150.00	30.00
03/31/15	Dizon, Rowen	Confirmed wire with BMS.	0.10	150.00	15.00
04/01/15	Dizon, Rowen	Reviewed Sloan payment schedules. Confirmed OTR wire from BMS.	0.30	150.00	45.00
04/02/15	Dizon, Rowen	Confirmed wire with BMS.	0.10	150.00	15.00
04/07/15	Dizon, Rowen	Confirmed bank wires from BMS.	0.10	150.00	15.00
04/14/15	Dizon, Rowen	Reviewed check request and processed payments.	0.20	150.00	30.00
04/20/15	Dizon, Rowen	Processed incoming bank receipts.	0.30	150.00	45.00
05/15/15	Dizon, Rowen	Reviewed check request and processed payments.	0.20	150.00	30.00
06/15/15	Dizon, Rowen	Reviewed check request and processed payment.	0.20	150.00	30.00
07/09/15	Dizon, Rowen	Reconciled ledger balance for period April 2015	0.20	150.00	30.00
07/10/15	Dizon, Rowen	Filed January 2015 Rabobank bank statements for bank files.	0.10	150.00	15.00
07/14/15	Dizon, Rowen	Filed Rabobank accounts documents for banking files for period January 2015.	0.10	150.00	15.00
07/16/15	Dizon, Rowen	Reviewed and reconciled bank ledgers.	0.10	150.00	15.00
07/17/15	Dizon, Rowen	Processed payments and fund transfers.	0.30	150.00	45.00
07/28/15	Dizon, Rowen	Reconciled and closed bank accounts.	0.20	150.00	30.00
09/15/15	Dizon, Rowen	Prepared corrected reports for case accountant to reconcile bank statements for period 7/31/15.	0.20	150.00	30.00
09/24/15	Dizon, Rowen	Filed Rabobank bank accounts documents for bank files for period April-May 2015.	0.10	150.00	15.00
10/07/15	Dizon, Rowen	Filed Rabobank bank accounts documents for bank files for period June 2015.	0.20	150.00	30.00
10/09/15	Dizon, Rowen	Filed Rabobank bank accounts documents for bank files for period July 2015.	0.10	150.00	15.00

THE TULVING COMPANY, INC.
R. TODD NEILSON, CHAPTER 7 TRUSTEE
DETAIL OF TASK CODES

February 1, 2015 through March 31, 2016

Date	Name	Description	Hours	Rate	Amount
Task Code: 110		Funds Administration			
10/19/15	Dizon, Rowen	Reviewed check request and processed payment.	0.20	150.00	30.00
10/20/15	Dizon, Rowen	Processed outgoing mail.	0.10	150.00	15.00
11/04/15	Dizon, Rowen	Filed Rabobank accounts documents for bank files for period August-September 2015.	0.20	150.00	30.00
11/05/15	Dizon, Rowen	Filed working documents for bank files.	0.30	150.00	45.00
11/17/15	Dizon, Rowen	Reviewed check request and processed payments.	0.20	150.00	30.00
11/19/15	Dizon, Rowen	Prepared email to BMS regarding On the Rocks wire information. Discussions with case accountant regarding wire sender information.	0.50	150.00	75.00
11/20/15	Dizon, Rowen	Discussions with case accountant regarding investor mass mailing. Contacted federal express regarding mass mailing.	0.40	150.00	60.00
12/16/15	Dizon, Rowen	Reviewed check request and processed payments	0.20	150.00	30.00
01/05/16	Dizon, Rowen	Created and provided bank reports to case accountant in preparation of 1099's.	0.30	155.00	46.50
01/27/16	Dizon, Rowen	Processed bond disbursements.	0.40	155.00	62.00
02/03/16	Dizon, Rowen	Filed Rabobank bank accounts documents for bank files for period October-November 2015.	0.10	155.00	15.50
02/16/16	Dizon, Rowen	Reviewed check request and processed payments. Processed fund transfer.	0.30	155.00	46.50
03/14/16	Dizon, Rowen	Reviewed check request and processed payments.	0.30	155.00	46.50
03/22/16	Dizon, Rowen	Reviewed check request and processed payments.	0.30	155.00	46.50
03/29/16	Dizon, Rowen	Reviewed check requests and processed payments.	0.40	155.00	62.00
Total for Task Code 110			10.00		\$1,510.50
Task Code: 130		Compliance Reporting			
02/19/15	Neilson, Todd	Review of bank statements, cancelled checks, reconciliations and memos for the month of January	0.20	700.00	140.00
06/24/15	Neilson, Todd	Review of bank statements, cancelled checks, reconciliations and memos for the month of May	0.20	700.00	140.00
07/06/15	Neilson, Todd	Filing of Trustee Report #6 and directions as to filing on line	0.50	700.00	350.00
07/13/15	Dizon, Rowen	Updated and processed quarterly bond reports.	0.30	150.00	45.00
07/22/15	Neilson, Todd	Review of bank statements, cancelled checks, reconciliations and memos for the month of June	0.30	700.00	210.00
10/13/15	Neilson, Todd	Review of bank statements, cancelled checks, reconciliations and memos for the month of September	0.20	700.00	140.00
11/12/15	Neilson, Todd	Review of Bank Statements, cancelled checks, reconciliations and memos for the month of October	0.30	700.00	210.00
11/24/15	Neilson, Todd	Motions to approve consent to Orders. Review of cash levels and discussions as to options	0.50	700.00	350.00
12/09/15	Neilson, Todd	Review of bank statements, cancelled checks, reconciliations and memos for the month of November	0.30	700.00	210.00

THE TULVING COMPANY, INC.
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February 1, 2015 through March 31, 2016

Date	Name	Description	Hours	Rate	Amount
Task Code: 130		Compliance Reporting			
01/13/16	Neilson, Todd	Review of Bank Statements, canceled Checks, reconciliations and memos for the month of December	0.30	720.00	216.00
01/14/16	Dizon, Rowen	Reviewed and updated bond status report.	0.20	155.00	31.00
01/15/16	Dizon, Rowen	Reviewed and printed bank reports in preparation of the annual case status reports.	0.40	155.00	62.00
01/18/16	Dizon, Rowen	Received additional information from case accountant and revised the annual case status report.	0.80	155.00	124.00
01/20/16	Dizon, Rowen	Reviewed and printed annual case status report for Trustee signature.	0.40	155.00	62.00
01/26/16	Dizon, Rowen	Revised and printed annual case status reports.	0.70	155.00	108.50
01/28/16	Dizon, Rowen	Reviewed and printed final annual case status report.	0.20	155.00	31.00
02/04/16	Dizon, Rowen	Printed declaration for Trustee's signature and transmittal.	0.10	155.00	15.50
02/24/16	Neilson, Todd	Review of bank statements, cancelled checks, signature, reconciliations and memos for the month of January	0.40	720.00	288.00
03/16/16	Dizon, Rowen	Provided blanket bond to case accountant.	0.20	155.00	31.00
03/31/16	Neilson, Todd	Communications and transfers between new Trustee, US Trustee, staff and others in preparation for transfer over to new Trustee	0.70	720.00	504.00
Total for Task Code 130			7.20		\$3,268.00
Task Code: 200		Claims Issues			
09/17/15	Neilson, Todd	Reviewed information on Gugasian claims	0.30	700.00	210.00
10/01/15	Neilson, Todd	Claims review and claims objections	0.60	700.00	420.00
03/13/16	Neilson, Todd	Reviewed motion to allow late filed claims	0.60	720.00	432.00
Total for Task Code 200			1.50		\$1,062.00
Task Code: 220		Creditor Meetings and Communications			
02/03/15	Neilson, Todd	Communications as to fees with noticed creditors	0.30	700.00	210.00
02/03/15	Neilson, Todd	Signing of notices to creditors and directions as to mailing and verification	0.30	700.00	210.00
02/17/15	Neilson, Todd	Communications with Creditors	0.30	700.00	210.00
02/18/15	Neilson, Todd	Communications to Creditor on proofs of claim	0.20	700.00	140.00
03/13/15	Neilson, Todd	Discussions with investors and the State of California	0.40	700.00	280.00
12/03/15	Neilson, Todd	Review and submittal of Trustee Report #7	0.70	700.00	490.00
12/04/15	Neilson, Todd	Preparation of Trustee Report and filings	0.80	700.00	560.00
12/06/15	Neilson, Todd	Communications with investors	0.30	700.00	210.00
12/11/15	Neilson, Todd	Reviewed Trustee report filings and receipt of responses from Creditors	0.80	700.00	560.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 220		Creditor Meetings and Communications			
01/06/16	Neilson, Todd	Preparation of e-mail to provide information as to transfer of coins and submittal of e-mail to Claimants and directions	0.80	720.00	576.00
01/06/16	Neilson, Todd	Communications with investors in response to e-mail	0.20	720.00	144.00
01/07/16	Neilson, Todd	Response to Creditor/Claimants on recent e-mail communications	0.70	720.00	504.00
01/27/16	Neilson, Todd	Coin transfers, responses as to claims of Creditors and responses to counsel and advisors	0.80	720.00	576.00
03/24/16	Neilson, Todd	Updates on Blog sites and timing analysis for inventory and other matters incidental to sale	0.60	720.00	432.00
Total for Task Code 220			7.20		\$5,102.00
Task Code: 320		Sale of Customer Info., IP and Operational Assets			
02/10/15	Neilson, Todd	Arrangements for transfer of data to Great Collections	0.30	700.00	210.00
08/05/15	Neilson, Todd	Discussions with Great Collections as to sale	0.80	700.00	560.00
09/09/15	Neilson, Todd	Review of communication on records. Discussions as to options for receiving records by Great Collections. Response to Debtor counsel and further directions to financial advisors	1.10	700.00	770.00
09/16/15	Neilson, Todd	Communications with Ian Russell as to valuation and sale issue	0.40	700.00	280.00
Total for Task Code 320			2.60		\$1,820.00
Task Code: 350		General Asset Disposition Issues			
06/25/15	Neilson, Todd	Review of acquisition of jewelry and gold for sale	0.40	700.00	280.00
08/03/15	Neilson, Todd	Proposals for sale. Review and options	1.10	700.00	770.00
08/05/15	Neilson, Todd	Discussions with AMPEX as to interest in sales	0.30	700.00	210.00
08/05/15	Neilson, Todd	Review of options and preparation of communications with allocation of inventory	2.30	700.00	1,610.00
09/03/15	Neilson, Todd	Working on proposal to liquidate coins	0.60	700.00	420.00
09/12/15	Neilson, Todd	Reviewed outlines and ranges for liquidation	1.20	700.00	840.00
09/14/15	Neilson, Todd	Review of inventory structures and valuations especially as to Presidential Error Coins, analysis of valuations, directions as to options and review of alternatives, directions as to accounting analysis required for claim analysis and allocations	5.80	700.00	4,060.00
09/15/15	Neilson, Todd	Review of valuations and directions as to claims, preparation of Excel Spread sheets detailing value of Presidential coins and directions as to accounting analysis to allocate coin values into claims	3.20	700.00	2,240.00
09/16/15	Neilson, Todd	Preparation of inventory and directions as to allocation to various claimants under certain conditions	1.30	700.00	910.00
09/23/15	Neilson, Todd	Discussions with Ian Russell of Great Collections as to grading issues on coins, valuations and sale provisions	0.50	700.00	350.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 350		General Asset Disposition Issues			
09/25/15	Neilson, Todd	Discussions with Ian Russell and Miles Standish as to valuation levels and directions as to ultimate disposition	0.80	700.00	560.00
10/05/15	Neilson, Todd	Receipt of information concerning possible plan for liquidation of coins in Delaware and responses to various parties.	0.80	700.00	560.00
10/13/15	Neilson, Todd	Reviewed contents of safe	0.20	700.00	140.00
10/19/15	Neilson, Todd	Communications and discussions as to transfer of inventory and accessibility as well as photographs.	0.40	700.00	280.00
10/19/15	Neilson, Todd	Conference call with Diane Bendis on sale of coins	0.30	700.00	210.00
10/22/15	Neilson, Todd	Conversations with financial advisors as to matters pending in inventory and sale	0.50	700.00	350.00
10/22/15	Neilson, Todd	Reviewed Tulving coin photos and directions as to filing	0.80	700.00	560.00
10/23/15	Neilson, Todd	Further review of inventory copies and communications with Bendis and others	0.40	700.00	280.00
10/26/15	Neilson, Todd	Transmittal of information to APMEX. Review and response as to options as well as turndown of offer to sell	0.40	700.00	280.00
10/26/15	Neilson, Todd	Review of sales of coins, access to documents and directions as to timing and sale	1.40	700.00	980.00
11/03/15	Neilson, Todd	Communications with James Wyatt as to coin sales and other valuation issues	0.60	700.00	420.00
11/04/15	Neilson, Todd	Communications with James Wyatt and counsel on Sale of Non Presidential Error Coins. Review of options and directions as to further analysis	1.20	700.00	840.00
11/09/15	Neilson, Todd	Communications to Heritage as to interest in coins and discussions as to transmittal	0.30	700.00	210.00
11/10/15	Neilson, Todd	Review of options and timing for transmittal to Heritage	0.40	700.00	280.00
11/11/15	Neilson, Todd	Arrangements to transfer pictures to Heritage. Response and timing	0.40	700.00	280.00
11/20/15	Neilson, Todd	Proposal review on sale of coins and allocation procedures on Error Coins as prepared by financial advisors	0.50	700.00	350.00
11/23/15	Neilson, Todd	Communications as to sales provisions and timing for sale of coins. Preparation and analysis of timing for sale	1.20	700.00	840.00
12/01/15	Neilson, Todd	Motions to approve Trustee Proposal. Preparation, review and amendments as well as filing	2.10	700.00	1,470.00
12/02/15	Neilson, Todd	Reviewed motion to Approve Proposal	0.40	700.00	280.00
12/09/15	Neilson, Todd	Review of auction agreement and resolutions with counsel	0.30	700.00	210.00
12/28/15	Neilson, Todd	Signing of documents and assistance with Greg Rohan on coin auction and conflicts	0.40	700.00	280.00
01/18/16	Neilson, Todd	Reviewed tentative ruling on sale and preparation for alternatives	0.40	720.00	288.00
01/26/16	Neilson, Todd	Reviewed responses to Greg Rohan of Heritage to review sales issues and directions as to removal of coins	0.80	720.00	576.00
02/08/16	Neilson, Todd	Reviewed stipulation on Sale of Coins	0.70	720.00	504.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 350		General Asset Disposition Issues			
02/08/16	Neilson, Todd	Reviewed opt out requests	0.20	720.00	144.00
02/09/16	Neilson, Todd	Review of opt out requests	0.20	720.00	144.00
02/09/16	Neilson, Todd	Discussions with James Wyatt and others relative to the return of the 7,400 coins	0.50	720.00	360.00
02/10/16	Neilson, Todd	Review of communications with Creditors and opt-out provisions	0.30	720.00	216.00
02/11/16	Neilson, Todd	Reviewed Opt out notices	0.20	720.00	144.00
02/12/16	Neilson, Todd	Reviewed Error Coin Distributions and timing issues	0.40	720.00	288.00
02/12/16	Neilson, Todd	Reviewed Stipulations for sale of coins	0.30	720.00	216.00
02/18/16	Neilson, Todd	Reviewed transfer of coins, sentencing and issues as to valuations.	0.80	720.00	576.00
02/22/16	Neilson, Todd	Communications with investors, AUSA, and accounting staff as to coins to be returned, timing for payments and other matters	0.80	720.00	576.00
03/02/16	Neilson, Todd	Review of past communications. Responses to creditors on sale, communications to Joshua Gibbons and communication to Heritage on turnover of coins.	1.20	720.00	864.00
03/08/16	Neilson, Todd	Discussions with advisors as to pickup of coins and transfer to Creditors. Timing, method and process	1.10	720.00	792.00
03/09/16	Neilson, Todd	Communication to Heritage on progress on sale and transport of coins. Discussions as to timing, procedures and inventory	1.00	720.00	720.00
03/17/16	Neilson, Todd	Review of coin inventory as prepared by BRG	0.90	720.00	648.00
Total for Task Code 350			40.30		\$28,406.00
Task Code: 351		Asset - Accounts Receivable			
02/03/15	Neilson, Todd	On The Rocks litigation and adjustment of pay-out and timing	0.20	700.00	140.00
02/19/15	Neilson, Todd	Discussions as to settlement with revisions with On the Rocks	0.20	700.00	140.00
02/26/15	Neilson, Todd	Approval of On the Rocks resolution and delivery of documents	0.20	700.00	140.00
03/06/15	Neilson, Todd	Reviewed Rule 9019 motion for On the Rocks	0.20	700.00	140.00
03/23/15	Dizon, Rowen	Reviewed emails from case accountant regarding On The Rocks payment schedule.	0.20	150.00	30.00
04/01/15	Dizon, Rowen	Reviewed and replied emails to case accountants regarding OTR payments.	0.30	150.00	45.00
11/19/15	Neilson, Todd	On the Rocks discussion with counsel and resolution of options	0.40	700.00	280.00
12/01/15	Neilson, Todd	On the Rocks discussions as to payment	0.20	700.00	140.00
12/17/15	Neilson, Todd	Consent order. Review and options	0.70	700.00	490.00
12/18/15	Neilson, Todd	Review of final compromise motion	0.40	700.00	280.00
12/21/15	Neilson, Todd	Made consent order adjustments	0.30	700.00	210.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 351		Asset - Accounts Receivable			
01/05/16	Neilson, Todd	Reviewed On the Rocks orders and timing for execution	0.20	720.00	144.00
02/09/16	Neilson, Todd	Reviewed On the Rocks collection procedures	0.20	720.00	144.00
02/15/16	Neilson, Todd	Reviewed order on dispositions and stipulations as well as declarations	0.50	720.00	360.00
Total for Task Code 351			4.20		\$2,683.00
Task Code: 500		Litigation Analysis and Issues			
02/04/15	Neilson, Todd	Communications with counsel and A-Mark counsel. Transfer of documents to CFTC.	0.30	700.00	210.00
02/04/15	Neilson, Todd	Communication with A-Mark and calculations as to business practices	0.30	700.00	210.00
02/20/15	Neilson, Todd	Preparation of communication on Marc One return of coins	0.40	700.00	280.00
02/27/15	Neilson, Todd	Discussions as to Marc One response and directions as to return of coins	0.40	700.00	280.00
03/02/15	Dizon, Rowen	Delivered signed settlement agreement to counsel's office.	0.30	150.00	45.00
03/27/15	Troszak, Nicholas	Read and replied to emails re. location of certain electronic files and extensions of those files with Mr. Tulving's counsel and work with staff to locate additional information.	0.30	420.00	126.00
03/30/15	Neilson, Todd	Reviewed Marc One Numismatics letter requests	0.40	700.00	280.00
04/26/15	Neilson, Todd	Possible clawback provisions on A-Mark agreement	0.30	700.00	210.00
09/09/15	Neilson, Todd	Marc One rule 2004 and further analysis of underlying motions	0.30	700.00	210.00
11/09/15	Neilson, Todd	Recap of Marc One discovery and further responses as to continued review	0.40	700.00	280.00
11/12/15	Neilson, Todd	Reviewed Marc One objections and directions	0.30	700.00	210.00
11/13/15	Neilson, Todd	Review of Marc One letter and accounting analysis as well as requests for further data	0.40	700.00	280.00
11/18/15	Neilson, Todd	Reviewed Seyller proposed Rule 2004 Exam	0.10	700.00	70.00
11/23/15	Neilson, Todd	Review and discussions as to Rule 2004 exam for Seyller	0.40	700.00	280.00
Total for Task Code 500			4.60		\$2,971.00
Task Code: 600		Government Inquires & Coordination			
02/02/15	Neilson, Todd	Responses to AUSA Zolot and responses to counsel	0.40	700.00	280.00
02/05/15	Neilson, Todd	Review of communications from Kevin Zolot as to access to documents and responses to both criminal counsel and Great Collections	0.80	700.00	560.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 600		Government Inquires & Coordination			
02/09/15	Neilson, Todd	Review of Thomas Petters Coordination agreement as example. Analysis of prior memos and Plea Agreements. Directions as to possible changes. Review of communications from AUSA and preparation of response	2.30	700.00	1,610.00
02/12/15	Neilson, Todd	Review of Coordination Agreement and Plea Agreements and suggested changes	1.10	700.00	770.00
02/14/15	Neilson, Todd	Preparation of letter to Kevin Zolot following amendments of Plea Agreement and Coordination Agreement with notes for possible changes	1.40	700.00	980.00
02/23/15	Neilson, Todd	Arrangements and scheduling to meet with AUSA and discussions with counsel on meeting and issues with Plea Agreements	0.30	700.00	210.00
02/26/15	Neilson, Todd	Review of proposal for resolution on sale of coins with AUSA's	0.70	700.00	490.00
02/27/15	Neilson, Todd	Conference call on resolution of Plea Agreement and Coordination agreement	0.50	700.00	350.00
03/02/15	Neilson, Todd	Review of requests for Plea Agreement and coordination agreement	0.50	700.00	350.00
03/03/15	Neilson, Todd	Finalization of Plea Agreement and Coordination Agreement. Communications with counsel and transmittal to AUSA Kevin Zolot	0.80	700.00	560.00
04/26/15	Neilson, Todd	Letter to Kevin Zolot requesting updates	0.30	700.00	210.00
06/09/15	Dizon, Rowen	Mailed out disc to Dmitry Vilenskiy	0.10	150.00	15.00
06/18/15	Neilson, Todd	Review of motions and progress on resolution of transfer issues from criminal actions to resolve sales issues on gold and other valuables. Review and finalization of motions, signing and transmittal.	1.50	700.00	1,050.00
06/20/15	Neilson, Todd	Review of options and timing for completion of inventory transfer	1.10	700.00	770.00
07/22/15	Neilson, Todd	Coordination agreement review	0.70	700.00	490.00
08/16/15	Neilson, Todd	Signing and transmittal of Coordination agreements	0.20	700.00	140.00
08/28/15	Neilson, Todd	Communications to Kevin Zolot and Hannes Tulving counsel. Review of options and directions as to claims and other matters. Response to various attorneys and directions as to options on inventory of coins, records and turnovers	2.30	700.00	1,610.00
09/15/15	Neilson, Todd	Discussions with Richard Foelber as to CFTC concerning case and filings by CFTC and agreement to accept service	0.80	700.00	560.00
09/16/15	Neilson, Todd	Discussions with Linda Cantor and directions as to discussions with CFTC	0.40	700.00	280.00
09/18/15	Neilson, Todd	Shared conference call concerning access to inventory and possible distribution to creditors with attorneys of Tulving, AUSAs, financial advisors and counsel to the Trustee	1.10	700.00	770.00
09/22/15	Neilson, Todd	Access to inventory in Delaware. Communications and notifications as well as timing issues.	0.40	700.00	280.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 600		Government Inquires & Coordination			
09/25/15	Neilson, Todd	Review of values and other matters in determining allocations. Communications with James Wyatt, Louie Condor USSS and others as to valuations and transfers of the data to Trustee and other interested parties	1.60	700.00	1,120.00
09/30/15	Neilson, Todd	Obtaining of Bendis zip drive to assist in inventory calculations and value	0.40	700.00	280.00
10/08/15	Neilson, Todd	Discussions with Bendis appraisal as to sale of coins	0.40	700.00	280.00
10/15/15	Neilson, Todd	Communication with Bendis appraisal. Review of prior memos and discussions with Bendis as to possible sales procedures. Communications with Secret Service as to options for access to Depository	2.10	700.00	1,470.00
10/16/15	Neilson, Todd	Discussions and communications as to inventory, location and sales options, discussions with staff and arrangements for further analysis of property pictures and timing for possible sale. Communications to Secret Service and other parties such as the CID	2.30	700.00	1,610.00
10/16/15	Neilson, Todd	Communications from Diane Bendis, appraiser and possible marketer of coins	0.80	700.00	560.00
10/18/15	Neilson, Todd	Further discussions with financial advisors as to access to coin inventory	0.30	700.00	210.00
10/19/15	Neilson, Todd	Review of prior memos from Kevin Zolot and preparation of detailed letter to Kevin on case progress, expenses, sales and inventory value	2.10	700.00	1,470.00
10/20/15	Neilson, Todd	Preparation for access to inventory and setting up of website	0.40	700.00	280.00
10/30/15	Neilson, Todd	Discussions as to access to coins, review of needs with Delaware depository, directions as to further review and timing for answers	1.80	700.00	1,260.00
11/03/15	Neilson, Todd	Meetings with counsel and advisors to discuss case administration and directions as to options for coin sale	1.10	700.00	770.00
11/05/15	Neilson, Todd	Consent order revisions and discussions with counsel as to revisions. Approval	0.60	700.00	420.00
11/16/15	Neilson, Todd	Preparation of memos to Kevin Zolot and James Wyatt on disposition of coins. Review of prior memos and discussions with staff. Analysis of options available for liquidation.	6.20	700.00	4,340.00
11/17/15	Neilson, Todd	Coins proposal for sale and liquidation. Review of motions, adjustments by staff and directions as to adjustments. Transfer to AUSA and counsel	1.80	700.00	1,260.00
11/18/15	Neilson, Todd	Motion to distribute pursuant to protocol. Transfer to counsel and AUSA's.	1.00	700.00	700.00
11/19/15	Neilson, Todd	Reviewed motion to approve Trustee's proposal for liquidation under Coordination Agreement	0.60	700.00	420.00
11/21/15	Neilson, Todd	Signing of documents and transfer of coins and allocation issues	0.40	700.00	280.00
02/03/16	Neilson, Todd	Analysis of timing for turnover of coins, communications to AUSA and other counsel. Timing for turnover of coins and further review of other options	1.80	720.00	1,296.00
03/18/16	Neilson, Todd	Discussions with probation officers on status of case	0.70	720.00	504.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 600		Government Inquires & Coordination			
Total for Task Code 600			44.10		\$30,865.00
Task Code: 900		General Case Administration			
02/17/15	Dizon, Rowen	Prepared overnight envelope to James Wyatt.	0.10	150.00	15.00
02/17/15	Dizon, Rowen	Processed outgoing mail.	0.10	150.00	15.00
02/24/15	Neilson, Todd	Review of tentatives and discussions as to attendance	0.30	700.00	210.00
03/11/15	Dizon, Rowen	Reviewed box TC-037 for clients emails.	0.50	150.00	75.00
03/13/15	Neilson, Todd	Reviewed tax issues	0.40	700.00	280.00
03/17/15	Dizon, Rowen	Processed outgoing mail.	0.10	150.00	15.00
04/14/15	Dizon, Rowen	Processed outgoing mail.	0.10	150.00	15.00
07/21/15	Dizon, Rowen	Processed outgoing mail.	0.10	150.00	15.00
10/14/15	Dizon, Rowen	Moved and reviewed boxes from Costa Mesa storage.	0.50	150.00	75.00
11/04/15	Dizon, Rowen	Reviewed and scanned leases agreements	0.20	150.00	30.00
12/01/15	Dizon, Rowen	Reviewed emails from counsel regarding motion to approve Trustee proposal.	0.20	150.00	30.00
01/28/16	Dizon, Rowen	Processed outgoing mail.	0.10	155.00	15.50
03/08/16	Dizon, Rowen	Scanned valuation and meeting notes for Todd Neilson.	0.20	155.00	31.00
Total for Task Code 900			2.90		\$821.50
Task Code: 925		Meeting and Communication - H. Tulving/Counsel			
02/03/15	Neilson, Todd	Contacting of Hannes Tulving to discuss assets	0.20	700.00	140.00
02/04/15	Neilson, Todd	Discussions with Hannes Tulving and Financial advisors as to MEL Error coins	0.30	700.00	210.00
03/06/15	Neilson, Todd	Communications with counsel for Hannes Tulving on tax issues	0.30	700.00	210.00
09/01/15	Neilson, Todd	Discussions with Tulving counsel and others as to progress on pending matters	0.50	700.00	350.00
Total for Task Code 925			1.30		\$910.00
Task Code: 940		Fee Application and Bill Preparation			
02/03/15	Perry, Evelyn	Researched, exported and reconciled fee and cost schedules through January 31, 2015.	1.80	150.00	270.00
02/10/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries from May 22, 2014 through January 31, 2015 in order to assign task codes, correct grammar.	1.80	420.00	756.00
02/10/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries from inception through May 21, 2014 in order to assign task codes, correct grammar.	1.40	420.00	588.00

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Date	Name	Description	Hours	Rate	Amount
Task Code: 940		Fee Application and Bill Preparation			
02/11/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries from case inception through May 21, 2014 in order to assign task codes and create exhibits for fee application.	1.80	420.00	756.00
02/12/15	Troszak, Nicholas	Analyzed and reviewed Chapter 11 funds received and distributed in order to calculate Trustee compensation handle.	0.70	420.00	294.00
02/12/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries from May 22, 2014 through January 31, 2015 in order to assign task codes and create exhibits for fee application.	2.30	420.00	966.00
02/12/15	Troszak, Nicholas	Analyzed and reviewed Chapter 7 funds received and distributed through January 31, 2015, in order to calculate Trustee compensation handle.	0.80	420.00	336.00
02/12/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries in order create fee application written descriptions, investigation section and overall fee application for the Chapter 7 Trustee.	2.20	420.00	924.00
02/12/15	Troszak, Nicholas	Analyzed and reviewed PACER and other documents in order to create fee application intro, debtor history, procedural background, settlements and structure of the Trustee's First interim Chapter 7 fee application.	2.30	420.00	966.00
02/13/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries in order update fee application, attached exhibits and send to superior and Trustee for review.	0.70	420.00	294.00
02/13/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries from May 22, 2014 through January 31, 2015 in order to update exhibits for fee application.	1.50	420.00	630.00
02/13/15	Troszak, Nicholas	Analyzed and reviewed Chapter 7 funds received and distributed through January 31, 2015, in order to calculate Trustee compensation handle.	0.30	420.00	126.00
02/17/15	Troszak, Nicholas	Analyzed and reviewed detailed time and expense entries in order update fee application, attached exhibits and send to superior and Trustee for review.	0.40	420.00	168.00
02/17/15	Neilson, Todd	Discussions as to fee app. Review of Chapter 7 versus 11 payments	0.60	700.00	420.00
02/18/15	Troszak, Nicholas	Analyzed and reviewed updates from Trustee re. Fee App and finalized the Chapter 11 and 7 fee applications with exhibits.	1.30	420.00	546.00
02/18/15	Neilson, Todd	Preparation of Chapter 11 and Chapter 7 Fee applications. Adjustments, revisions and directions as to counsel and financial advisor input. Preparation for timely filing	2.10	700.00	1,470.00
02/19/15	Dizon, Rowen	Analyzed and reviewed BRG fee application for chapter 7 & 11 fees and expenses for court filing.	1.40	150.00	210.00
02/19/15	Dizon, Rowen	Analyzed and reviewed Trustee fee application for chapter 7 & 11 fees and expenses for court filing.	1.30	150.00	195.00
03/16/15	Dizon, Rowen	Reviewed/replied emails to Trustee regarding fee applications.	0.20	150.00	30.00

THE TULVING COMPANY, INC.
R. TODD NEILSON, CHAPTER 7 TRUSTEE
DETAIL OF TASK CODES

February 1, 2015 through March 31, 2016

Date	Name	Description	Hours	Rate	Amount
Task Code: 940					
Fee Application and Bill Preparation					
Total for Task Code 940			24.90		\$9,945.00
Total Professional Services			150.80		\$89,364.00

Exhibit C

THE TULVING COMPANY, INC.
R. TODD NEILSON, CHAPTER 7 TRUSTEE
Summary of Expenses

February 1, 2015 through March 31, 2016

Expenses	Amount
Computer Services / Supplies - E-Discovery	\$424.05
Express Messenger/Shipping	\$94.79
Postage	\$31.50
Travel - Other	\$56.50
Total	\$606.84

**THE TULVING COMPANY, INC.
R. TODD NEILSON, CHAPTER 7 TRUSTEE
EXPENSES**

February 1, 2015 through March 31, 2016

Date	Description	Amount
01/31/15	Re: Payment of Expenses Travel to and from Tulving hearings in Orange County/Santa Ana - 100 miles round trip at 56.6 cents per mile on: 21/05/2014 paid to Car Expense for 60 - Travel & Other Meals (EV) 24695-1 Voucher No. 65938 for Invoice No. 24695 issu	56.50
02/17/15	Voucher No. 66165 for Invoice No. 1970 issued by (469) Strong Connexions IT Solutions	25.00
02/23/15	Voucher No. 66875 for Invoice No. 2-945-19764 issued by (6) FedEx	28.39
03/31/15	Berkeley Research Group LLC - Postage Invoice #: 03012015 Vchr Comment: Century City postage, Validations, and parking log for February Timekeeper : 00345 - Judd, David Timekeeper : 09999 - Applicable, Not	13.90
03/31/15	Berkeley Research Group LLC - Postage Invoice #: 03012015 Vchr Comment: Century City postage, Validations, and parking log for February Timekeeper : 00345 - Judd, David Timekeeper : 09999 - Applicable, Not	0.48
04/02/15	Berkeley Research Group LLC - Postage Invoice #: 03/31/2015 Vchr Comment: March Postage, Validations & Copies. Timekeeper : 00345 - Judd, David	0.48
05/14/15	Strong Connexions IT Solutions - Other Invoice #: 2078 Timekeeper : 09999 - Applicable, Not	149.05
05/27/15	FedEx - Express Messenger/Shipping Timekeeper : 09999 - Applicable, Not Invoice #: 5-033-47814	25.17
06/30/15	FedEx - Express Messenger/Shipping Timekeeper : 09999 - Applicable, Not Invoice #: 5-077-08725	15.75
07/31/15	Strong Connexions IT Solutions - Other Invoice #: 2166 Vchr Comment: Fee for Tulving BankRuptcy Website Timekeeper : 09999 - Applicable, Not	50.00
08/20/15	BRG Misc Clearing - Postage Invoice #: 06012015 Vchr Comment: June 2015 Century City Postage Log Timekeeper : 09999 - Applicable, Not	1.61
09/30/15	BRG Misc Clearing - Postage Timekeeper : 09999 - Applicable, Not Invoice #: 093015	12.96
09/30/15	BRG Misc Clearing - Postage Timekeeper : 09999 - Applicable, Not Invoice #: 093015	1.15
12/09/15	FedEx - Express Messenger/Shipping Timekeeper : 09999 - Applicable, Not Invoice #: 5-244-74202	14.13
01/06/16	Strong Connexions IT Solutions - Data Retrieval Invoice #: 2350 Timekeeper : 09999 - Applicable, Not	100.00
01/31/16	Strong Connexions IT Solutions - Other Invoice #: 2400 Timekeeper : 09999 - Applicable, Not	25.00
01/31/16	BRG Misc Clearing - Postage Timekeeper : 09999 - Applicable, Not Invoice #: 013116 Vchr Comment: January 2016 Century City Postage Log	0.92
02/22/16	FedEx - Express Messenger/Shipping Timekeeper : 09999 - Applicable, Not Invoice #: 5-325-68275	11.35
02/29/16	Strong Connexions IT Solutions - Data Retrieval Invoice #: 2442 Timekeeper : 09999 - Applicable, Not	75.00
Total Expenses		\$606.84

Exhibit D



R. Todd Neilson, Managing Director

2049 Century Park East, Suite 2525

Los Angeles, California 90067

Direct: 310.499-4934

Fax: 310.557-8982

Email: tneilson@thinkbrg.com

Summary

R. Todd Neilson is currently a Managing Director at Berkeley Research Group LLC. Previously, Mr. Neilson was a Director with LECG, LLC and was a founding partner of Neilson Elggren LLP (formerly Neilson, Elggren, Durkin & Co.). He is one of the nation's foremost experts in bankruptcy and forensic accounting with over thirty five years combined experience in public accounting and as a Special Agent with the FBI.

In 1986, he was a founding partner of Neilson, Elggren, Durkin and Co., which was acquired by an international financial consulting firm in March 1998, where Mr. Neilson was a partner from March 1998 to September 2000. Prior to 1986, he was a manager in the Litigation/Consulting Services department of the international CPA firm of KMG/Main Hurdman for four years and also served as a special agent in the Federal Bureau of Investigation, specializing in accounting investigation of white-collar and organized crime. Due to his background, Mr. Neilson offers a unique set of skills in the areas of financial consulting and as an expert in the field of forensic accounting and fraud litigation.

Mr. Neilson is a seasoned professional having acted as a Trustee, financial consultant and expert witness in numerous high-profile accounting related litigation engagements involving complex bankruptcy reorganization matters including accounting and fraud issues, tracing of funds, financial data reconstruction, damages and lost profits, Ponzi and RICO matters, valuation, and business viability issues. Mr. Neilson has acted as bankruptcy Trustee for notable clients such as Suge Knight and Death Row Records. As Trustee, he has also operated, and negotiated the sale of an extremely large and diverse array of assets, including one of the largest Ford dealerships in the nation, an ownership interest in both the Los Angeles Kings' and Nashville Predators' hockey franchises, luxury hotels, sand and rock quarries, antique art collections, real estate, and trucking companies. Having evaluated and sold well over \$1 billion dollars of assets, Mr. Neilson brings substantial credibility to the court - credibility borne of practical, not just theoretical experience.



Mr. Neilson is a nationally recognized expert in bankruptcy and accounting having served on the national Board of Directors of the Association of Insolvency and Restructuring Advisors, Chairman of the Securities Advisory Board in the State of Utah, faculty for the Certified Fraud Examiners, and a member of the Society of the Former Special Agents of the Federal Bureau of Investigation. He has spoken on bankruptcy, litigation support, valuation and fraud related topics to numerous professional groups such as American Institute of Certified Public Accountants (AICPA), National Conference of Bankruptcy Judges, California and Utah Society of CPA's and numerous colleges and universities throughout the United States. Mr. Neilson formerly served as an Associate Professor in the Graduate School of Accounting at the University of Utah, where he taught courses on Forensic Accounting. He has also provided regular instruction on accounting and fraud related litigation issues at the FBI Academy to CPA/FBI Agents and to Postal Inspectors at the United States Postal Service national training center. He was a co-author of the *AICPA Bankruptcy Practice Guide*, issued as a practice aid to all CPA's in the United States and co-author of *The CPA's Handbook of Fraud and Commercial Crime Prevention*, also issued by the AICPA. He was also inducted as a fellow in the prestigious American College of Bankruptcy, one of only a handful of CPA's in the United States given that honor.

Mr. Neilson has been involved in some of the highest profile litigation and bankruptcy matters in the nation. Highlighted below are some of the cases, which demonstrate his unique background and experience.

Case Examples

American Suzuki Motor Corporation

American Suzuki Motor Corporation ("ASMC"), a California corporation and a subsidiary of parent Suzuki Motor Corporation ("SMC"), filed a Chapter 11 Bankruptcy in November 2012, which effectively allowed for the transfer and sale of all business assets of ASMC, not affiliated with car sales, to SMC and facilitated the withdrawal of Suzuki from all new car sales in the United States. Prior to the filing, R. Todd Neilson, and another independent Board member, was added to the ASMC Board of Directors. Neilson, and the other independent Director, constituted a separate Committee ("Committee") and were tasked with the responsibility of reviewing the underlying assets of the Debtor, the intended Plan of Reorganization and implementation of the proposed Plan in order to make an independent decision as to the filing of a Chapter 11. The Committee ultimately authorized the filing of the ASMC Chapter 11, monitored the administration of the Bankruptcy, and following



confirmation of the Chapter 11 Plan, remained as an Advisory Board to review the implementation of the Plan and distribution of assets pursuant to the Plan.

Tremont v. KPMG

R. Todd Neilson was engaged as a damage expert in the litigation between Tremont Holdings Group Inc. ("Tremont") and KPMG in relation to investments made with Bernard L. Madoff Investment Securities ("BMIS"). Tremont was the second largest investor with BMIS with billions of dollars invested over fourteen years. Following the appointment of Irving Picard as Chapter 11 Trustee, Picard brought litigation against Tremont and related entities asserting a number of avoidance actions and equitable subordination claims. As a result of that litigation, Tremont settled with Picard for over a billion dollars. Subsequent to the settlement, a complaint was filed by Tremont against KPMG as independent auditors of the Tremont funds asserting billions of dollars in damages as a result of KPMG's audit insufficiencies. Neilson was asked to provide an expert opinion as to the damages suffered by the Tremont entities due to the alleged inadequacies in the KPMG audits. Neilson issued an expert report in April 2013 contesting the damages asserted against KPMG by Tremont. As a result of the expert report, the Tremont claimants withdrew their previously asserted damage analysis.

Solyndra LLC

In late 2011, following a national search by the Solyndra Board of Directors, Mr. Neilson was appointed as Chief Restructuring Officer of Solyndra, the US manufacturer of solar photovoltaic power systems specifically designed for large commercial and industrial rooftops. On August 31, 2011, subsequent to receiving a \$535 million loan guarantee from the Department of Energy, Solyndra had approximately 968 full time employees and 211 temporary employees. On September 6, 2011, Solyndra was unable to continue active business operations and filed a Chapter 11 Bankruptcy. Mr. Neilson supervised the efforts at selling the remaining assets of Solyndra and also provided a detailed report concerning Solyndra business operations to both the Court and other interested parties.

Ezri Namvar

Mr. Neilson is acting as Chapter 11 Trustee for the Ezri Namvar bankruptcy. Mr. Namvar, a well known member of the Iranian Jewish Community in Los Angeles, has received \$3 billion in investments and loans over the past 5 years and disbursed those funds through close to 400 separate LLC's involving ownership in a wide array of assets such as hotels, golf courses, low-income housing projects, pistachio farms, conference center sites, medical buildings and ground leases. Mr. Neilson is assisting in the task to untangle this multitude of



inter-related LLC's involving Mr. Namvar. Mr. Namvar was convicted of fraud following a trial and is presently incarcerated in a federal prison.

Roman Catholic San Diego Diocese Chapter 11 Bankruptcy

In April 2007, Mr. Neilson was the Court Appointed Expert in the Chapter 11 Bankruptcy of the Roman Catholic San Diego Diocese. The Court charged Mr. Neilson with providing an expansive report into the accounting and financial operations of the San Diego Diocese as well as related Catholic Parishes. It was the first time an independent Expert has been appointed for such a task in regards to a number of the Diocese bankruptcies throughout the United States.

Le-Nature's, Inc. Chapter 11 Bankruptcy

In 2007, Mr. Neilson was appointed Chapter 11 Bankruptcy Trustee for Le-Nature's, a water, iced tea, and juice drink distributor located in Latrobe, Pennsylvania and Phoenix, Arizona. Mr. Neilson supervised the liquidation of Le-Nature's bottling plants and other assets as well as directed the forensic accounting analysis of a purported \$750 million accounting fraud perpetrated upon the creditors of Le-Nature's and related companies.

Ralph O. Esmerian and R. Esmerian, Inc. Chapter 11 Bankruptcies

In 2010, Mr. Neilson was appointed as Examiner with expanded powers in the Chapter 11 bankruptcy matters of Ralph O. Esmerian and R. Esmerian, Inc. Mr. Neilson directed the investigation in the debtors' pre petition activities, pursued causes of action against various former associates of Mr. Esmerian and other third parties, and liquidated the debtors' assets, which included an extensive collection of rare and antique jewelry, a valuable artwork collection and a Manhattan apartment.

Michael Tyson and Michael Tyson Enterprises

Michael Tyson, former heavyweight champion of the world, and Michael Tyson Enterprises Inc. filed for bankruptcy protection in August 2003. Neilson Elggren was appointed as financial consultants and crisis managers for Mr. Tyson and Michael Tyson Enterprises Inc. Mr. Neilson was the responsible partner for that engagement.

Adelphia Communications Corp

In August 2002, Neilson Elggren was appointed as Accountants to the Official Committee of Unsecured Creditors in the Adelphia Communications Corp ("Adelphia") bankruptcy. The Adelphia bankruptcy was the 6th largest cable company in the nation. Their filing constituted one of the largest bankruptcies in history encompassing over 200 subsidiaries and



approximately \$21 billion in accumulated debt. Mr. Neilson acted as the primary partner in charge of the engagement. The prior owners of Adelphia, members of the Rigas family, were alleged to have engaged in the systematic looting of Adelphia. Neilson Elggren was engaged to the voluminous financial transactions of Adelphia and provide expert testimony as to their findings.

DVI, Inc.

DVI filed for Chapter 11 Bankruptcy protection on August 25, 2003. Mr. Neilson was appointed as Examiner and conducted an extensive investigation of financial transactions involving the assets, liabilities, operations and financial condition of DVI and its subsidiaries (including all transactions and relationships between debtor and non-debtor subsidiaries and affiliates). DVI, with assets of approximately \$3 billion, provided financing for diagnostic imaging and other sophisticated medical equipment. As part of its financing operations, DVI originated hundreds of millions of dollars in financing contracts and sold these contracts to institutional investors through over thirty (30)) investment-grade securitization vehicles. The accounting examination included the accounting practices of the debtor and any and all allegations of fraud, dishonesty, incompetence, misconduct, mismanagement, or financial and / or corporate irregularities. Mr. Neilson coordinated a cooperative effort involving numerous law enforcement and government agencies, including the Office of the U.S. Trustee, the United States Attorneys' Office in Delaware and Pennsylvania, the Securities and Exchange Commission, the Federal Bureau of Investigation, and the United States Postal Service, all of which were tasked with conducting further investigations based upon the findings in the Examiner's report.

IT Group

In April 2002, Mr. Neilson was appointed examiner in IT Group, a Chapter 11 bankruptcy in the District of Delaware. IT Group was a leading provider of services in the areas of consulting, engineering and construction, remediation, and facilities management. In 2000, IT Group had over 7,500 employees in 80 domestic offices and 10 international offices and its annual revenues on a consolidated basis were approximately \$1.4 billion. Neilson provided a detailed report detailing the assets, liabilities, valuation and financial condition of IT Group as well as its capabilities of confirming a stand-alone plan of reorganization versus a sale of existing assets to an interested purchaser.

Allegheny Health, Education and Research Foundation ("AHERF")

AHERF was a large conglomerate of medical hospitals and research centers located in the eastern part of the US. Neilson Elggren was engaged as financial advisors to Mellon Bank



Group Credit Facility to provide expert testimony concerning whether or not substantive consolidation was justified for AHERF, and whether the Plan of Reorganization as proposed by the AHERF Trustee unfairly prejudiced one or more creditors. Mr. Neilson led the preparation of a detailed report in response to the plan, which resulted in a settlement favorable to the Mellon Bank Group.

Reed Slatkin

Reed Slatkin, one of the co-founders of Earthlink, filed Chapter 11 bankruptcy in 2001 following pending legal actions by many of the individuals who had invested millions of dollars with Slatkin under the promise of substantial returns. Neilson Elggren investigated Slatkin's enterprises and business practices over a period of fifteen years and provided a report detailing one of the largest Ponzi schemes in California history involving over \$600 million of business transactions during that period. Mr. Neilson was appointed as Trustee in the Slatkin bankruptcy and was given the responsibility of liquidating substantial assets throughout the United States, including hotels, unimproved real estate, shopping malls, interests in movie production companies, and other substantial equity investments. Slatkin pled guilty and was incarcerated for a lengthy period in a federal prison.

Charles Keating/Lincoln Savings

Mr. Neilson was engaged as an expert witness in the litigation involving Charles Keating and American Continental Corporation, the parent company of Lincoln Savings, and the bondholders who invested approximately \$250 million in the debentures of American Continental. He directed the review of approximately \$727 million, which passed through American Continental from 1984 through 1989 and testified as to the findings in the federal District Court in Tucson, Arizona. The day after Mr. Neilson's testimony, two major defendants settled for over \$90 million. Total settlements in this matter exceeded \$300 million.

Bruce McNall Chapter 11 Bankruptcy

Mr. Neilson was appointed Chapter 11 Trustee in the personal bankruptcy of Bruce McNall in Los Angeles. Mr. McNall's holdings include ownership of the Los Angeles Kings hockey franchise, ownership interest in the Toronto Argonauts Canadian football franchise, as well as considerable holdings in thoroughbred horses, rare coins and antiques, and sports memorabilia. Mr. McNall was incarcerated for bank fraud. Mr. Neilson supervised the accounting investigation into Mr. McNall's past activities, which included tracing of over \$2.5 billion in cash and asset transfers



Technical Equities Chapter 11

Mr. Neilson directed the accounting analysis detailing the financial demise of Technical Equities, a San Francisco-based investment company and reportedly the largest investor fraud case in U.S. history at that time. Harry Stern, former chief executive officer of Technical Equities, was sentenced to Federal prison for his role in the investor fraud. Mr. Neilson and his professionals traced almost \$600 million in cash and prepared a damage analysis. As a result of his testimony, a settlement was achieved for the benefit of the creditors of Technical Equities.

Adnan Khashoggi/Triad America

Mr. Neilson was appointed as Trustee of Triad America Corporation. Triad America is the parent corporation of sixty separate companies with \$200 million in total claims. Mr. Neilson directed the accounting and litigation effort, which resulted in the freezing of all assets in the United States, owned by Adnan and Essam Khashoggi and the subsequent payment of \$32 million by Adnan Khashoggi to the bankruptcy estate.

Property Mortgage Company

Property Mortgage Company was a second mortgage company which had operated successfully in the Southern California area for over 40 years. The company filed for bankruptcy protection, asserting debts in excess of \$100 million dollars to approximately 1,000 investors. Mr. Neilson was appointed as Trustee. In that capacity, he supervised the analysis of hundreds of millions of dollars flowing through the company. Based upon that review, we concluded that for a number of years prior to its demise the company had been operating a Ponzi scheme, paying old investors with the funds secured from fresh investors. As a result of our accounting investigation the President and Chief Executive Officer as well as two other participants were convicted of fraud.

Dovie Beams de Villagran

Mr. Neilson was appointed by the Federal Bankruptcy Court in California as Examiner in the bankruptcy of Dovie Beams de Villagran, former mistress of Ferdinand Marcos. As a result of the report filed with the Court and Mr. Neilson's testimony, Mrs. de Villagran was convicted on thirty-nine counts of bank fraud and embezzlement for filing false and misleading financial statements with federally insured banks.



Previous Employment History

- LECG, LLC – Mr. Neilson was a director at LECG, where he led a group that provided a combination of bankruptcy services, forensic and investigative accounting services, litigation consulting, corporate recovery and reorganization, valuation and tax services.
- Neilson Elggren LLP – Mr. Neilson was one of the founding partners of a practice that provided a combination of bankruptcy services, forensic and investigative accounting services, litigation consulting, corporate recovery and reorganization, valuation and tax services. Offices for Neilson Elggren LLP were located in Los Angeles, California, Salt Lake City, Utah and Wilmington, Delaware.
- Arthur Andersen – Arthur Andersen was formerly one of the “Big 5” international CPA and business-consulting firms with over 80,000 employees worldwide. Mr. Neilson served as a partner and national director of Trustee/Receiver practices throughout the United States for Arthur Andersen. He also served as a member of the Executive Committee for the Global Corporate Finance division of Arthur Andersen.
- Neilson, Elggren, Durkin & Co. - As one of the founding partners of this regional and consulting firm, Mr. Neilson was instrumental in the growth of this firm from a small office in Salt Lake City to a regional practice specializing in bankruptcy and litigation support services. The firm had grown to 85 employees and six offices prior to its merger with Arthur Andersen.
- KMG/Main Hurdman, Salt Lake City, Utah - Actively engaged as an expert witness in matters involving accounting and finance relating to contract claims, breach of contract, fraud, civil and criminal RICO, embezzlement, securities fraud, criminal matters, bankruptcy, and public hearings before regulatory bodies.
- Chief Deputy Auditor - Salt Lake County - Responsible for the accounting department, budget department, internal audit department and land assessment division for the Salt Lake County Auditor’s Office. Within this capacity directed the office staff of 45 individuals and reviewed audits of governmental departments prior to issuance.
- Federal Bureau of Investigation - Special Agent Accountant - Responsible for accounting investigations including racketeer influenced and corrupt organizations involved in bank fraud, fraud against the government, bankruptcy fraud, mail fraud, securities fraud and others.



Education

- Bachelor of Science, University of Utah 1975
- Associate Professor – Graduate School of Accounting – University of Utah

Publications

- Co-Author of *AICPA Bankruptcy Practice Guide*. Authoritative practice guide to be issued to all practicing Certified Public Accountants in the United States, 1994
- Co-Author *The CPA's Handbook of Fraud and Commercial Crime Prevention* issued by the AICPA, 2002
- “*Substantive Consolidation Accounting Issues*” article for *Bankruptcy Litigation Counselor*, 1994
- “*Methods for Uncovering & Conducting Investigative Audits*,” Utah State Auditors Operation Manual, 1982

Professional Memberships

- Association Of Insolvency Accountants - National Board of Directors
- Former Chairman - Securities Advisory Board - State of Utah - Accounting Profession Representative
- Former Chairman - Utah Association of CPA's - Professional Conduct and Ethics Sub-Committee
- Member - National Association of Bankruptcy Trustees
- American Institute of Certified Public Accountants
- Utah Association of Certified Public Accountants
- Society of Former Special Agents of the Federal Bureau of Investigation - Past President of the Utah Chapter
- Former Board Member - Salt Lake City/County Board of Health Advisory Board



- Chairman of the Board – Private Bank of California

Instruction and Presentations

- Instructor for the Certified Public Accountants Criminal Investigation Seminar at the FBI Academy in Quantico, Virginia.
- Association of Insolvency Accountants – Tax Implications of Selling Assets in Bankruptcy – San Diego, California 1999
- National Conference of Bankruptcy Judges – Valuations of Businesses in Bankruptcy – Dallas, Texas 1998
- American Bankruptcy Institute – Western Region – Procedures and Practices for Valuing Businesses in Bankruptcy – 1998
- Law and Justice Center – Utah Fellows of the American Academy of Matrimonial Lawyers - Methods of Valuing Businesses in Divorce – Salt Lake City, Utah – 1997
- Certified Fraud Examiners – Presentation on Fraud and Accounting Issues – Salt Lake City, Utah – 1997
- Associated Women – CPA's – Litigation Support and Accounting Issues – Salt Lake City, Utah 1997
- California Bankruptcy Institute – Accounting for Difficult Fraudulent Conveyances – Fresno, California 1997
- Association of Insolvency Accountants Valuation Conference, - Relief from Stay Valuation Issues, Salt Lake City, Utah, 1994
- Expert Witness Seminar - Preparing Accountants as Expert Witnesses, Salt Lake City, Utah, 1994
- Association of Insolvency Accountants National Conference, Washington, D.C. Plan of Reorganization Accounting Issues, 1993
- Association of Insolvency Accountants National Conference, Santa Monica, California - Role of Examiner in Bankruptcy, 1992



- Beta Alpha Psi - University of Utah, Brigham Young University, and Weber State University
- National Association of Accountants (Utah Chapter), Salt Lake City, Utah, 1982 and 1984
- Insolvency seminars at the University of Southern California (USC), University of Utah, Brigham Young University, and Weber State College
- Arizona CPA Litigation Services Conference, The Bankruptcy Arena, The Role of the Accountant, 1991



Nicholas R. Troszak, Associate Director

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Summary

Nicholas R. Troszak is an Associate Director at Berkeley Research Group, LLC ("BRG") in the Los Angeles, California office. Mr. Troszak has more than ten years of experience providing services in bankruptcy, forensic accounting, and litigation support.

Mr. Troszak has been involved in chapter 11 and chapter 7 bankruptcy cases, providing accounting services to chapter 11 and 7 trustees, independent examiners and to the official committee of unsecured creditors. His experience includes claims analyses, solvency analyses, the tracing of funds to prepare avoidance action litigation, pre- and post-petition transfer analyses and the liquidation of assets.

Case Examples

- *In re Solyndra LLC* – Financial Advisors to chapter 11 trustee. On August 31, 2011, after receiving a \$535 million loan guarantee from the Department of Energy (DOE), Solyndra had approximately 968 full time employees and 211 temporary employees. On September 6, 2011, Solyndra was unable to continue active business operations and filed a chapter 11 bankruptcy petition. Mr. Troszak performed financial analyses and drafted key sections of the chapter 11 trustee's report concerning Solyndra business operations, which was filed with the bankruptcy court.
- *In re Ezri Namvar and In re Namco Capital Group, Inc.* – Accountants and financial advisors to both the chapter 11 trustees of both bankruptcy estates. A well-known member of the Iranian Jewish community in Los Angeles received \$3 billion in investments and loans over five years and disbursed those funds through close to 400 separate LLC's holding a wide array of assets such as hotels, golf courses, low-income housing projects, pistachio farms, conference center sites, medical buildings and ground leases. Mr. Troszak has worked to untangle the financial and business relationships among this multitude of inter-related LLC's.
- *In re Galleria USA, Inc.* ("GUSA") – Accountants and financial advisors to the chapter 11 trustee. GUSA was an importer of furniture for Big Box retailers. GUSA, along with its sister company in Asia, had collective obligations to their secured and unsecured creditors totaling approx. \$233 million. Mr. Troszak assisted in the liquidation of inventory and the investigation of fraud related to the loan collateral and inflated sales. The chapter 11 trustee released a detailed accounting



report based on this investigation, which ultimately led to the indictment of the two principals of the debtor.

- *In re Slatkin* - Accountants to the chapter 11 trustee. Mr. Troszak assisted in the forensic accounting investigation of Slatkin's enterprises and business practices and contributed to a written report detailing one of the largest Ponzi schemes in California history involving more than \$600 million of business transactions. Mr. Troszak also assisted in liquidating substantial assets throughout the United States, including hotels, unimproved real estate, shopping malls, interests in movie production companies and other substantial equity investments.

Other Engagements

- *In re Aerospace Design, Inc.* – Accountants to Chapter 7 Trustee
- *In re Cedar Funding, Inc* – Accountants and Financial Advisors to Chapter 11 Trustee
- *In re Death Row Records, Inc.* – Accountants to the Chapter 11 & 7 Trustee
- *In re Express.com* – Accountants to the Chapter 11 Trustee
- *In re Focus Media, Inc.* – Accountants to the Chapter 11 Trustee
- *In re JMS Automotive* – Accountants to the Chapter 11 Trustee
- *In re GGW Brands, LLC et al.* – Accountants to the Chapter 11 Trustee
- *In re J.C. Jeffers* – Accountants to the Chapter 11 Trustee
- *In re Metropolitan Mortgage* – Accountants to the Chapter 11 Examiner
- *In re Michael G. Tyson* – Accountants to the Debtor, Chapter 11
- *In re Peck / Jones Construction* – Accountants to the Chapter 7 Trustee
- *In re Ray Gonzales* – Accountants to the Chapter 11 Trustee
- *In re State Fish Company, Inc.* – Accountants to the Chapter 11 Trustee
- *In re the Roman Catholic Bishop of San Diego* – Accountants to Court-Appointed Expert
- *In re The Tulving Company, Inc. a Corporation* – Accountants to the Chapter 7 Trustee

Employment History

2011 – present	BRG, LLC ; Los Angeles, CA Managing Consultant/Senior Managing Consultant/Associate Director
2005 – 2011	LECG, LLC ; Los Angeles, CA Staff Accountant/Senior Accountant/Managing Consultant
2004 – 2005	Neilson Elggren LLP ; Los Angeles, CA Staff Accountant

Education

Bachelor of Arts, Accounting
Michigan State University, East Lansing, Michigan



Testimony

- GGW Brands, LLC. - Case No. 13-15130-SK – United States Bankruptcy Court – Central District of California; Testimony: Person most knowledgeable re. Accounting Transactions and Operations of the GGW Brands, *et al.*
- Cedar Funding, Inc. v. Mercy Springs Rd. Inc, et al - Case No. M116075 – Superior Court of the State of California – County of Monterey; Testimony: Accounting Transactions & Loan Payoff Calculations related to Cedar Funding, Inc.
- Cedar Funding, Inc. v. R. Domras, et al - Case No. M116080 – Superior Court of the State of California – County of Monterey; Testimony: Accounting Transactions & Loan Payoff Calculations related to Cedar Funding, Inc.
- Cedar Funding, Inc. v. J. Paquin, et al - Case No. M116081 – Superior Court of the State of California – County of Monterey; Testimony: Accounting Transactions & Loan Payoff Calculations related to Cedar Funding, Inc.
- Cedar Funding, Inc. - Case No. 08-52709-CN – United States Bankruptcy Court – Northern District of California; Testimony: Accounting Transactions related to Cedar Funding, Inc.
- U.S. v. Nilsen, David et al - Case No. CR 09-0895 EJD - United States District Court – Northern District of California; provided Grand Jury Testimony: Accounting Transactions & Loan Payoff Calculations related to Cedar Funding, Inc.

Licenses & Certifications

Certified Public Accountant – California
Certified Insolvency & Restructuring Advisor (CIRA)
Certified In Financial Forensics (CFF)

Professional Memberships

American Bankruptcy Institute
American Institute of Certified Public Accountants
Association of Certified Fraud Examiners
Association of Insolvency & Restructuring Advisors
California Society of Certified Public Accountants

Board & Committee Positions

2013 – 2014	Western Center on Law and Poverty – Advisory Board Member
2013 – present	Turnaround Underground, Los Angeles – Planning Committee Member



Rowen Dizon, Accounting Technician

2049 Century Park East
Suite 2525
Los Angeles, California 90067
Phone: 310 499-4778
Fax: 310 557-4750
Email: rdizon@thinkbrg.com

Summary

Rowen Dizon has over ten years experience providing administrative support to Chapter 7 Trustees. He is directly involved in the processing of all Chapter 7 & Chapter 11 banking, including deposits, transfers of funds, issuing checks, opening accounts and maintaining filing systems. Rowen is also involved with serving and filing Trustee's motions and notices, preparing and maintaining back-up for disbursements and deposits as well as various other tasks in bankruptcy matters.

Rowen is also involved in our scanning department. His responsibilities include sorting and scanning various incoming and outgoing documents using the LaserFische computer system.

Education

Management – Holy Angel University, Angeles City, Philippines



Evelyn S. Perry, Paraprofessional

201 South Main Street, Suite 450
Salt Lake City, Utah 84111
Direct: 801.321.0082
Fax: 801.364.6230
Email: eperry@thinkbrg.com

Summary

Evelyn Perry is a member of Berkeley Research Group, LLC ("BRG") with over twenty-three years' experience in the areas of Bankruptcy and Tax. Prior to joining BRG she was with LECG LLC, Neilson Elggren LLP, Arthur Andersen LLP in the Global Corporate Finance division and Neilson Elggren Durkin & Company.

Evelyn's responsibilities include the preparation and submission of fee application pleadings to the bankruptcy court as well assisting with assembly and submission of tax returns. Other responsibilities include reconciliation and assembly of billings to litigation, tax and other clients, reconciliation of client bank accounts and related support duties assisting professionals.

Case Examples

- Kenetech Windpower - Engagement wherein the firm represents the creditors committee in the ongoing litigation of the largest windpower manufacturer in the United States.
- Death Row Records—Trustee and Accountants to the Trustee.
- LeNature — Accountants to the Trustee.
- Robert B. Solomon – Chapter 11 Debtor-in-possession.
- Estate Financial – Accountants to the Trustee.
- Reed E. Slatkin (One of California's largest ponzi schemes) -Accountants to the Trustee.
- Adelphia – Forensic Accountants to the Creditor Committee.

Education

Ricks College, Associates Degree in Business Education

Exhibit E



Invoice

Date	Invoice #
2/2/2015	1970

Bill To
Tulving Bankruptcy Attn: R. Todd Neilson Berkeley Research Group, LLC 2049 Century Park East, Suite 2525 Los Angeles, CA 90067

			P.O. No.	Terms	
				Due on receipt	
Date	Service ID	Description	Hours	Rate	Amount
1/27/2015	Consulting(100)	Updated trustee report links	0.25	100.00	25.00
Thank you for your business.			Total		\$25.00
Unpaid balances of more than 30 days past due are subject to a finance charge of 1.5 percent per month. For questions or concerns call Jason at (801) 824-6166					



Invoice

Date	Invoice #
5/1/2015	2078

<p>Bill To</p> <p>Tulving Bankruptcy Attn: R. Todd Neilson Berkeley Research Group, LLC 2049 Century Park East, Suite 2525 Los Angeles, CA 90067</p>
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			P.O. No.	Terms	
				Due on receipt	
Date	Service ID	Description	Hours	Rate	Amount
4/9/2015	Consulting(100)	Updated website's home page	0.25	100.00	25.00
4/23/2015	Consulting(100)	Renewed tulvingbankruptcy.com domain name and web hosting	0.25	100.00	25.00
4/23/2015		tulvingbankruptcy.com domain name and web hosting renewal		99.05	99.05
Thank you for your business.			Total		\$149.05
Unpaid balances of more than 30 days past due are subject to a finance charge of 1.5 percent per month. For questions or concerns call Jason at (801) 824-6166					



Invoice

Date	Invoice #
8/1/2015	2166

Bill To

Tulving Bankruptcy
Attn: R. Todd Neilson
Berkeley Research Group, LLC
2049 Century Park East, Suite 2525
Los Angeles, CA 90067

			P.O. No.		Terms
					Due on receipt
Date	Service ID	Description	Hours	Rate	Amount
7/6/2015	Consulting(100)	Updated web home, trustee and claim pages	0.25	100.00	25.00
7/9/2015	Consulting(100)	Updated FAQ and claims pages	0.25	100.00	25.00
</					



Invoice

Date	Invoice #
1/1/2016	2350

Bill To
Tulving Bankruptcy Attn: R. Todd Neilson Berkeley Research Group, LLC 2049 Century Park East, Suite 2525 Los Angeles, CA 90067

			P.O. No.		Terms	
					Due on receipt	
Date	Service ID	Description	Hours	Rate	Amount	
12/4/2015	Consulting(100)	Updated web, home, trustee report and filings pages	1	100.00	100.00	
Thank you for your business.			Total \$100.00			
Unpaid balances of more than 30 days past due are subject to a finance charge of 1.5 percent per month. For questions or concerns call Jason at (801) 824-6166						



Invoice

Date	Invoice #
2/1/2016	2400

Bill To
Tulving Bankruptcy Attn: R. Todd Neilson Berkeley Research Group, LLC 2049 Century Park East, Suite 2525 Los Angeles, CA 90067

			P.O. No.	Terms	
					Due on receipt
Date	Service ID	Description	Hours	Rate	Amount
1/29/2016	Consulting(100)	Updated Proof of Claim form on website	0.25	100.00	25.00
Thank you for your business.			Total		\$25.00
Unpaid balances of more than 30 days past due are subject to a finance charge of 1.5 percent per month. For questions or concerns call Jason at (801) 824-6166					



Date	Invoice #
3/1/2016	2442

Bill To:

Tulving Bankruptcy
Attn: R. Todd Neilson
Berkeley Research Group, LLC
2049 Century Park East, Suite 2525
Los Angeles, CA 90067

Please remit payments to:

230 South 500 East, Suite 465
Salt Lake City, UT 84102

Terms
Due on receipt

Date	Service ID	Description	Hours	Rate	Amount
2/4/2016	Consulting(100)	Updated filings page	0.25	100.00	25.00
2/11/2016	Consulting(100)	Updated website, home page.	0.5	100.00	50.00

Thank you for your business.

Total	\$75.00
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Unpaid balances of more than 30 days past due are subject to a finance charge of 1.5 percent per month. For questions or concerns call Jason at (801) 783-3355 ext. 313

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2029 Century Park East, Suite 1250 Los Angeles CA 90067.

A true and correct copy of the foregoing document entitled (specify) SECOND INTERIM AND FINAL APPLICATION OF R. TODD NEILSON FOR ALLOWANCE AND PAYMENT OF FEES AND EXPENSES INCURRED AS CHAPTER 7 TRUSTEE FOR THE PERIOD MAY 22, 2014 THROUGH MARCH 31, 2016 will be served or was served in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 11, 2018, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached service list

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) June 11, 2018, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on June 11, 2018, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Federal Express

The Honorable Erithe A. Smith
United States Bankruptcy Court
Central District of California
Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5040
Santa Ana, CA 92701-4593

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 11, 2018
Date

Rowen Dizon
Printed Name

/s/ Rowen Dizon
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Wesley H Avery** wamiracle6@yahoo.com, wavery@rpmlaw.com
- **Candice Bryner** candice@brynerlaw.com
- **Philip Burkhardt** phil@burkhardtandlarson.com, stacey@burkhardtandlarson.com
- **Stephen L Burton** steveburtonlaw@aol.com, ellie.burtonlaw@gmail.com
- **Frank Cadigan** frank.cadigan@usdoj.gov
- **Linda F Cantor** lcantor@pszjlaw.com, lcantor@pszjlaw.com
- **Roger F Friedman** rfriedman@rutan.com
- **David L Gibbs** david.gibbs@gibbslaw.com, ecf@gibbslaw.com
- **Nancy S Goldenberg** nancy.goldenberg@usdoj.gov
- **Lawrence J Hilton** lhilton@onellp.com, lthomas@onellp.com; info@onellp.com; evescance@onellp.com; crodriguez@onellp.com; rwenzel@onellp.com
- **James KT Hunter** jhunter@pszjlaw.com
- **Robbin L Itkin** ritkin@linerlaw.com, cbullock@linerlaw.com
- **John H Kim** jkim@cookseylaw.com
- **Weneta M Kosmala (TR)** ecf.alert+Kosmala@titledexi.com, wkosmala@txitrustee.com; dmf@txitrustee.com; kgeorge@kosmalalaw.com
- **Nanette D Sanders** becky@ringstadlaw.com
- **Richard C Spencer** rspencer@rspencerlaw.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

2. **SERVED BY UNITED STATES MAIL:**

Benjamin Bain-Creed
Assistant United States Attorney
Suite 1650, Carillon Building
227 West Trade Street
Charlotte, North Carolina 28202

Weneta M. A. Kosmala
3 MacArthur Place
Santa Ana, CA 92707